

## Remarks

Claims 1-21 are now pending in this application. Applicants have amended claims 1, 8, 18, and 19 and added claim 21 to clarify the claimed invention. Applicants respectfully request favorable reconsideration of this application.

Applicants submit herewith one sheet of corrected drawings in which Applicant has added the legend "Prior Art" to Fig. 1. Applicants respectfully request entry of the corrected drawings and withdrawal of the objection to the drawings.

The Examiner rejected claims 19 and 20 under double patenting. Claims 19 and 20 are not substantial duplicates of claims 1 and 17 since, among other things, claim 19 specifies that one of the points is a contact point and one is a securing point. Accordingly, claims 19 and 20 are not substantial duplicates of claims 1 and 17 and Applicant respectfully requests withdrawal of this rejection.

The amendment to claims 1, 8, 18 that the contact/securing points are located in the cavity is supported by the specification at page 4, lines 1-3, and lines 7-13; page 5, lines 9-11; and Figs. 3-5.

The Examiner rejected claims 1-5 and 14-20 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 6,125,715 to Nissfolk. The Examiner rejected claims 6 and 7 under 35 U.S.C. § 103(a) as being unpatentable over Nissfolk. The Examiner rejected claims 8-13 under

35 U.S.C. § 102(b) as being anticipated by or under 35 U.S.C. § 103(a) as being unpatentable over Nissfolk.

Nissfolk does not disclose the invention recited in claim 1 since, among other things, Nissfolk does not disclose an industrial robot that includes a first contact/securing point and a second contact securing point in an internal cavity. Rather, Nissfolk et al. discloses a cable that is secured at a point 47 outside of the "internal cavity" 37 identified by the Examiner. Also, a separation element 51 is arranged between point 47 and the "internal cavity" 37. Additionally, Nissfolk discloses that the cable is secured with securing members 41 at a number of points in the "internal cavity" 37 between the point 47 and point 38, as shown in Figs. 4-6 and as described at col. 3, line 60, through col. 4, line 11.

Accordingly, Nissfolk does not disclose a structure that includes a first contact/securing point and a second contact/securing point located in an internal cavity or a length of cable that extends freely through the internal cavity from the first contact/securing point to the second contact/securing point. Rather, Nissolk discloses a structure in which the cable needs to be threaded through the structure and attached at multiple locations. Additionally, the separation element must be affixed to the inner walls of the assembly. Disassembly of the structure disclosed by Nissfolk is also complicated and time consuming. All of these elements result in a structure that leads to longer maintenance and repair times, thereby decreasing productivity and increasing production costs.

The claimed invention avoids all of these problems by including a first contact/securing

point and a second contact/securing point located in an internal cavity or a length of cable that extends freely through the internal cavity from the first contact/securing point to the second contact/securing point. The claimed invention is simpler and less expensive. Changing out a cable or a part of a cable may be quickly and easily carried out.

In view of the above, Nissfolk does not disclose all elements of the invention recited in claims 1-5 and 8-20. Since Nissfolk does not disclose all elements of the invention recited in claims 1-5 and 8-20, the invention recited in claims 1-5 and 8-20 is not properly rejected under 35 U.S.C. § 102(b). For an anticipation rejection under 35 U.S.C. § 102(b) no difference may exist between the claimed invention and the reference disclosure. *See Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 U.S.P.Q. 841 (C.A.F.C. 1984).

Along these lines, anticipation requires the disclosure, in a cited reference, of each and every recitation, as set forth in the claims. *See Hodosh v. Block Drug Co.*, 229 U.S.P.Q. 182 (Fed. Cir. 1986); *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985); *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986); and *Akzo N.V. v. U.S. International Trade Commissioner*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986).

Nissfolk does not suggest the invention recited in claims 6 and 7 since, among other things, Nissfolk does not suggest an industrial robot that includes a first contact/securing point and a second contact/securing point located in an internal cavity or a length of cable that extends freely through the internal cavity from the first contact/securing point to the second contact/securing point. Whether or not Nissfolk suggests an electric motor, Nissfolk does not suggest the

structure of the industrial robot recited in claim 1, from which claim 6 depends. Additionally, Nissfolk does not suggest an internal cavity as recited in claim 1 or an excess of cable extending between a first contact/securing point to a second contact/securing point within an internal cavity. Therefore, Nissfolk does not suggest the invention recited in claims 6 and 7 and Applicants respectfully request withdrawal of this rejection.

Nissfolk does not suggest the invention recited in claim 8 since, among other things, Nissfolk does not suggest an industrial robot that includes a first contact/securing point and a second contact/securing point located in an internal cavity or a length of cable that extends freely through the internal cavity from the first contact/securing point to the second contact/securing point. Therefore, Nissfolk does not suggest a method of connecting at least part of at least one cable between a first part and a second part of an industrial robot as recited in claim 8 and Applicants respectfully request withdrawal of this rejection.

Furthermore, a disadvantage of the structure suggested by Nissfolk is that the structure requires a space for the cable and a contact behind the motor. Embodiments of the claimed invention can eliminate the need for such a space. As a result, a corresponding space in a structure according to embodiments of the claimed invention can be used, for example, to house a larger motor, which may be desirable. Alternatively, rather than increasing a size of the motor, the tilt housing could be made smaller and more compact. Additionally, embodiments of the claimed invention provide the possibility to have a contact on "top of the motor". This can make the contact easily accessible.

In view of the above, the reference relied upon in the office action does not disclose or suggest patentable features of the claimed invention. Therefore, the reference relied upon in the office action does not anticipate the claimed invention or make the claimed invention obvious. Accordingly, Applicants respectfully request withdrawal of the rejections based upon the cited reference.

In conclusion, Applicants respectfully request favorable reconsideration of this case and early issuance of the Notice of Allowance.

If an interview would advance the prosecution of this case, Applicants urge the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

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